

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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IN RE: TERRORIST ATTACKS ON ) Civil Action No. 03 MDL 1570 (GBD) (SN)  
SEPTEMBER 11, 2001 )  
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This document relates to:

*Federal Insurance Co., et al. v. al Qaida, et al.*, No. 03-cv-6978  
*Vigilant Insurance Co., et al. v. Kingdom of Saudi Arabia, et al.*, No. 03-cv-8591  
*Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al.*, No. 03-cv-9849  
*Estate of John P. O'Neill, Sr., et al. v. Kingdom of Saudi Arabia, et al.*, No. 04-cv-1922  
*Continental Casualty Co., et al. v. Al Qaeda, et al.*, No. 04-cv-5970  
*Cantor Fitzgerald Assocs., et al. v. Akida Inv. Co., et al.*, No. 04-cv-7065  
*Pacific Employers Insurance Co., et al. v. Kingdom of Saudi Arabia, et al.*, No. 04-cv-7216  
*Euro Brokers Inc., et al. v. Al Baraka Inv. & Dev. Corp., et al.*, No. 04-cv-7279  
*Beazley Furlonge Ltd. v. Saudi Binladin Group, Inc., et al.*, No. 16-cv-7456  
*Bowrosen, et al. v. Kingdom of Saudi Arabia*, No. 16-cv-8070  
*McCarthy, et al. v. Kingdom of Saudi Arabia*, No. 16-cv-8884  
*Aguilar, et al. v. Kingdom of Saudi Arabia, et al.*, No. 16-cv-9663  
*Addesso, et al. v. Kingdom of Saudi Arabia, et al.*, No. 16-cv-9937  
*Hodges, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-117  
*DeSimone v. Kingdom of Saudi Arabia*, No. 17-cv-348  
*Aiken, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-450  
*Ashton, et al. v. Kingdom of Saudi Arabia*, No. 17-cv-2003  
*The Underwriting Members of Lloyd's Syndicate 53, et al. v. Kingdom of Saudi Arabia, et al.*,  
No. 17-cv-2129  
*The Charter Oak Fire Insurance Co., et al. v. Al Rajhi Bank, et al.*, No. 17-cv-2651  
*General Reinsurance Corp., et al. v. Kingdom of Saudi Arabia*, No. 17-cv-3810  
*Abarca, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-3887  
*Arrowood Indemnity Co. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-3908  
*Abrams, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-4201  
*Abtello, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-5174  
*Aasheim, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-5471

**MOTION TO EXTEND PRO HAC VICE ADMISSION**  
**TO ALL CONSOLIDATED MDL CASES, AND NOTICES OF APPEARANCE**

**I. Motion To Extend *Pro Hac Vice* Admission of Mark C. Hansen**

PLEASE TAKE NOTICE that the Kingdom of Saudi Arabia (“Saudi Arabia”) hereby moves this Court for an Order extending the *pro hac vice* admission of Mark C. Hansen to all cases consolidated into 03 MDL 1570 (GBD) (SN), a multi-district litigation (“MDL”) before this Court.

Mark C. Hansen was admitted as counsel *pro hac vice* on March 10, 2004, for purposes of this MDL and Civil Action Nos. 02-cv-6977, 02-cv-7300, 03-cv-5071, 03-cv-5493, 03-cv-5738, 03-cv-6978, 03-cv-7036, and 03-cv-9849. *See* Dkt. 17.

As this Court is aware, numerous additional cases have been consolidated into this MDL in recent months. Moving for *pro hac vice* admission in each related case would be cumbersome and would require repeated applications to the Court. Saudi Arabia moves the Court to extend counsel’s *pro hac vice* admission to all cases consolidated into 03 MDL 1570, now or in the future, and to permit counsel to appear in the above-captioned cases by filing notices of appearance, and to do the same in other consolidated MDL cases as appropriate.

The relief requested as to Mr. Hansen is identical to relief granted by an earlier order of this Court as to Saudi Arabia’s counsel Michael K. Kellogg and Gregory G. Rapawy. *See* Dkt. 3485.

**II. Notices of Appearance by Mark C. Hansen, Michael K. Kellogg, and Gregory G. Rapawy**

To the Clerk of this Court and all parties of record:

PLEASE TAKE NOTICE that Saudi Arabia has applied to extend the *pro hac vice* admission of Mark C. Hansen to all cases consolidated into this MDL. If that request is granted, Saudi Arabia respectfully requests that the Court enter Mr. Hansen’s appearance as its counsel in

the above-captioned MDL cases, which it understands to include every case in which plaintiffs have adopted the Consolidated Amended Complaint. *See* Dkt. 3463.

This Court extended the *pro hac vice* admissions of Michael K. Kellogg and Gregory G. Rapawy to all consolidated cases on March 28, 2017. *See* Dkt. 3485. Saudi Arabia respectfully requests that the Court enter their appearances as its counsel in the above-captioned cases.

The caption above lists two recently filed cases—*Aasheim* and *Abtello*—in which plaintiffs have filed a Short Form Complaint but have not yet requested a waiver of service from Saudi Arabia or made any filing on the consolidated MDL docket. Saudi Arabia identified these cases through searches of the PACER system. Based on the docket as of this filing, it appears that *Aasheim* has been formally incorporated into the consolidated MDL but *Abtello* has not. Saudi Arabia wishes to file appearances in these cases to ensure that it may file copies of its forthcoming motion to dismiss on their individual dockets on August 1.

In filing these appearances, Saudi Arabia respectfully reserves all defenses and objections to these lawsuits, including without limitation objections to this Court's subject matter or personal jurisdiction.

Respectfully submitted,

*/s/ Michael K. Kellogg*

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July 27, 2017

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**CERTIFICATE OF SERVICE**

I hereby certify that, on July 27, 2017, I caused an electronic copy of the foregoing Motion To Extend *Pro Hac Vice* Admission and Notices of Appearance to be served electronically by the Court's Electronic Case Filing (ECF) System. I caused the foregoing to be filed on the MDL docket and the dockets for the following consolidated cases:

*Federal Insurance Co., et al. v. al Qaida, et al.*, No. 03-cv-6978  
*Vigilant Insurance Co., et al. v. Kingdom of Saudi Arabia, et al.*, No. 03-cv-8591  
*Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al.*, No. 03-cv-9849  
*Estate of John P. O'Neill, Sr., et al. v. Kingdom of Saudi Arabia, et al.*, No. 04-cv-1922  
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*DeSimone v. Kingdom of Saudi Arabia*, No. 17-cv-348  
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*Abarca, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-3887  
*Arrowood Indemnity Co. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-3908  
*Abrams, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-4201  
*Abtello, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-5174  
*Aasheim, et al. v. Kingdom of Saudi Arabia, et al.*, No. 17-cv-5471

/s/ Michael K. Kellogg

Michael K. Kellogg

July 27, 2017